

## **REMARKS**

Claims 1, 2, 30, 31, 48, 49, 66 and 67 have been amended. Claims 1-20, 30-41 and 48-79 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### **Section 102(e) Rejection:**

The Examiner rejected claims 1-20, 30-41 and 48-79 under 35 U.S.C. § 102(e) as being anticipated by Mead et al. (U.S. Publication 2003/0067912) (hereinafter “Mead”). Applicants respectfully traverse this rejection for at least the reasons presented below.

Regarding claim 1, Mead fails to disclose a unique peer identifier configured for use in distinguishing a particular peer node from others of the plurality of peer nodes in a peer-to-peer environment, wherein the peer identifier is independent of a network address of the particular peer node. Mead teaches a directory service for peer routers. In Mead’s system, a source router locates a peer destination router by using a database maintained on a server. Mead’s database maps end station destination network addresses to the network addresses of peer routers capable of routing packets to particular end stations (Mead, Abstract, paragraphs [0016 - 0017] and [0056]). Mead uses network addresses to identify the routers in his peer routing scheme. Specifically, Mead teaches that a router checks its reachability cache to determine if the destination address of a packet is saved in the cache. If the destination address for the packet is in the cache, the reachability cache returns the IP address of the router that can reach the packets destination address (paragraph [0040]). Similarly, Mead describes how if a router cannot find a packet’s destination address in its cache, it queries the Reachability Server. Mead teaches that the Reachability Server determines whether it has an entry for the destination address of the packet and if so the Reachability Server returns the IP address of the reachability router that can reach the destination address (paragraph [0041]). Communication between router peers in Mead is based entirely on the network addresses of each peer router. Nowhere does Mead describe a peer identifier configured for use in distinguishing a peer

node that is independent of a network address for the peer node. To the contrary, Mead specifically teaches using network addresses to identify the routers in Mead's system.

Regarding claim 3, contrary to the Examiner's assertion, Mead fails to disclose that each peer node is configured to access another peer node using the unique peer identifier of the other peer node, where the peer node does not use a network address of the other peer node to access the other peer node. The Examiner cites paragraphs [0004-0006] from the background section of Mead. However, the cited portion, as part of Mead's background, describes features of other systems and does not describe Mead's system. The cited passage does not mention a peer node accessing another peer node using a unique peer identifier where the peer node does not use a network address of the other peer node to access the other node. Instead, the cited passage describes how, in the SNA architecture, one peer router determines a route to a destination end station that other peer routers use to communicate a packet to that destination end station. The cited portion also describes how a peer router may use information from a packet's header to determine a particular protocol to use when sending the packet. The cited section does not describe a peer node accessing another peer node using a unique peer identifier where the peer node does not use a network address of the other peer node to access the other node.

Moreover, it is improper for the Examiner to rely on features from multiple different systems (even when described in one reference) in a rejection based on anticipation (i.e. § 102). Applicants remind the Examiner that anticipation requires the presence in a single prior art reference disclosure of each and every limitation of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). As discussed above, Mead fails to disclose that each peer node is configured to access another peer node using the unique peer identifier of the other peer node, where the peer node does not

use a network address of the other peer node to access the other peer node. Therefore, Mead cannot be said to anticipate claim 3.

Thus, for at least the reasons above, the rejection of claim 3 is not supported by the prior art and removal thereof is respectfully requested. Similar remarks apply to claims 34 and 50.

Regarding claim 7, Mead does not disclose wherein each peer identifier is configured for use in determining a particular peer group in which a particular peer node corresponding to the peer identifier is a member peer, contrary to the Examiner's contention. The Examiner cites paragraphs [0004-0006], [0013], [0046-0047] and [0060] of Mead. However, none of the cited passages mentions a peer identifier configured for use in determining a peer group in which a peer node is a member peer. Instead, as noted above, paragraphs [0004-0006] describe features of systems other than Mead's system and do not mention anything about determining a particular peer group to which a peer node belongs. Paragraph [0013] mentions that a router peer updates in routing tables with the destination address of received packets and how the router may send out an ICANREACH broadcast message, in response to a CANUREACH message, if it can reach a particular destination end station. Paragraphs [0046-0047] and [0060] describe how Mead's reachability table is indexed by the addresses of destination end stations and that the IP address of router peers can be obtained from the reachability table.

Thus, none of the passages cited by the Examiner mention anything regarding a peer identifier configured for use in *determining a particular peer group* in which a particular peer node corresponding to the peer identifier is a member peer. For at least the reasons above, the rejection of claim 7 is not supported by the prior art and removal thereof is respectfully requested. Similar arguments apply to claims 9, 33, 54 and 69.

Regarding claim 8, Mead fails to disclose wherein each of the plurality of peer nodes is further configured to participate as a member peer in one or more peer groups in the peer-to-peer environment, and wherein each of the plurality of peer nodes is assigned

a different unique peer identifier in accordance with the peer-to-peer platform for each of the one or more peer groups in which the peer node is a member peer. None of the portions cited by the Examiner (paragraphs [0004-0006], [0013], [0046-0047], and [0060]) mention anything about a peer node being assigned a different peer identifier for each peer group in which the peer node is a member peer. As noted above, regarding claim 1, Mead uses the network address of a peer router to identify that router. Thus, nowhere does Mead describe assigning different peer identifiers to a peer node for each peer group in which the peer is a member peer. Therefore, the rejection of claim 8 is not supported by the prior art and removal thereof is respectfully requested. Similar remarks apply to claims 55 and 70.

Regarding claim 12, Mead does not disclose that the peer-to-peer platform defines a peer advertisement format for describing and publishing advertisements for peer nodes in the peer-to-peer environment, contrary to the Examiner's assertion. The Examiner cites paragraphs [0004], [0039], [0043], [0052-0053] and [0066-0067] where Mead describes his peer routers using CANUREACH and ICANREACH message to determine which, if any, peer router can reach a particular destination end station. However, none of the cited passages describes any sort of peer advertisement format for describing and publishing advertisements for peer nodes. Instead, they merely describing one peer router sending out a CANUREACH message when attempting to find another peer router than can reach a particular destination.

Mead further fails to disclose that each of the plurality of peer nodes is configured to generate a peer advertisement for the particular peer node, wherein the peer advertisement includes a peer identifier for the peer node. As noted above, the passages cited by the Examiner describe two particular messages, neither of which can be considered a peer advertisement. Instead, as noted above, Mead's CANUREACH message is broadcast to locate a peer router that can reach a particular destination and the ICANREACH response message informs the requester than a peer router can reach that destination. Neither message can be considered a peer advertisement. Furthermore, even if one could consider the ICANREACH message a peer advertisement, which Applicants

maintain one cannot, Mead does not teach that *each* of the peer routers generates an ICANREACH message. Thus, the rejection of claim 12 is not supported by the prior art and removal thereof is respectfully requested. Similar remarks apply to claims 36, 58, and 73.

Applicant also asserts that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.



## CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above-referenced application from becoming abandoned, Applicant(s) hereby petition for such an extension. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-07700/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Notice of Change of Address
- ☐ Other:

Respectfully submitted,

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